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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10

11 MARCIANO PLATA, et al.,

12 *Plaintiffs,*

13 v.

14 ARNOLD SCHWARZENEGGER, et al.,

15 *Defendants.*
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Case No. C01-1351 TEH

**DECLARATION OF STEVE CAMBRA
IN SUPPORT OF RECEIVER'S MOTION
FOR ORDER ADJUDGING
DEFENDANTS IN CONTEMPT FOR
FAILURE TO FUND RECEIVER'S
REMEDIAL PROJECTS AND/OR FOR
AN ORDER COMPELLING
DEFENDANTS TO FUND SUCH
PROJECTS**

Date: October 6, 2008

Time: 10:00 a.m.

Courtroom: Hon. Thelton E. Henderson

1 I, Steve Cambra, declare as follows:

- 2 1. I am a custody support specialist working with the Receiver. I make this declaration in
3 support of the Receiver's Motion to have Defendants adjudged in contempt. For the
4 better part of the last two years, I have been assigned by the Receiver to participate in the
5 planning for the Receiver's various construction projects including the 10,000 bed
6 project, the facility upgrade projects and coordination with the CDCR regarding AB 900
7 construction.
- 8 2. From the inception, we have involved officials from the State in the planning of these
9 projects. In particular, as part of the Receiver's planning with respect to the 10,000 bed
10 project, we established a Core Planning Team. From the very beginning, perhaps as
11 many as a half dozen CDCR employees, all of whom report to Robin Dezember, the
12 Chief Deputy Secretary of Correctional Health Care Services, have been members of or
13 consultants to the Core Planning Team. This has included employees who were involved
14 with planning for mental health and dental facilities to ensure adequate consideration of
15 and coordination with projects necessary to address deficiencies in mental and dental
16 health at CDCR. The Core Planning Team has also included the court experts and
17 representatives of the Special Master in the *Coleman*, *Perez* and *Armstrong* class actions.
18 More recently, officials from the State Department of Mental Health ("DMH") have
19 participated on the Core Planning Team because prisoners currently housed in DMH
20 facilities will be moved to the new facilities to be constructed so as to free up those
21 facilities for other purposes. Finally, employees with Bovis, the project manager for the
22 10,000 bed project, have been included on the Core Planning Team.
- 23 3. The Core Planning Team has developed the draft Facility Program Statement that
24 describes the anticipated construction and programming associated with that construction
25 at the seven facilities to be constructed as part of the 10,000 bed project. The Core
26 Planning Team has also made recommendations to the Receiver with respect to the
27 sequence in which the seven facilities should be constructed. Bovis, as the construction
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1 project manager, has provided the cost estimates associated with the design, planning and
 2 construction concepts developed by the Core Planning Team. From very early in the
 3 process Bovis has estimated that construction of the new facilities could cost as much as
 4 \$6 billion.

- 5 4. With respect to the facilities upgrade projects to be undertaken at each of the 33 prisons,
 6 we have developed planning teams at each prison in turn to help plan the upgrades for
 7 that prison. These teams included employees reporting to Mr. Dezember, as well as
 8 wardens and the health care staff located at the specific prisons. Each plan has taken
 9 roughly 8 weeks to develop and CDCR and other State employees have been involved at
 10 every step of the way in the planning for the upgrades. Based on cost estimates provided
 11 by Vanir Construction, we originally anticipated that the upgrades would cost about \$1
 12 billion in total. However, more recent decisions to include mental and dental health
 13 upgrades have increased the anticipated cost to about \$2 billion. Once again, employees
 14 from the CDCR and the court representatives in *Coleman*, *Perez* and *Armstrong* have
 15 been actively involved in the planning and decision making for the upgrade projects.
- 16 5. In short, at every step of the way, the Receiver's planning and programming for his
 17 construction projects, as well as the cost information developed as a result of that
 18 planning and programming, have been developed with the assistance of and in
 19 consultation with State agencies and State officials.

20 I declare under penalty of perjury under the laws of the State of California that the foregoing
 21 is true and correct.

22 Dated: September 22, 2008

23 /s/ Steve Cambra
 Steve Cambra

24 I hereby attest that I have on file all holograph
 25 signatures for any signatures indicated by a
 "conformed" signature (/s/) within this efiled
 document.

26 /s/ Martin H. Dodd
 27 Martin H. Dodd
 Attorneys for Receiver J. Clark Kelso

CERTIFICATE OF SERVICE

The undersigned hereby certifies as follows:

I am an employee of the law firm of Futterman & Dupree LLP, 160 Sansome Street, 17th Floor, San Francisco, CA 94104. I am over the age of 18 and not a party to the within action.

I am readily familiar with the business practice of Futterman & Dupree, LLP for the collection and processing of correspondence.

On September 22, 2008, I served a copy of the following document(s):

DECLARATION OF STEVE CAMBRA IN SUPPORT OF RECEIVER'S MOTION FOR ORDER ADJUDGING DEFENDANTS IN CONTEMPT FOR FAILURE TO FUND RECEIVER'S REMEDIAL PROJECTS AND/OR FOR AN ORDER COMPELLING DEFENDANTS TO FUND SUCH PROJECTS

by placing true copies thereof enclosed in sealed envelopes, for collection and service pursuant to the ordinary business practice of this office in the manner and/or manners described below to each of the parties herein and addressed as follows:

— BY FACSIMILE: I caused said document(s) to be transmitted to the telephone number(s) of the addressee(s) designated.

X BY MAIL: I caused such envelope(s) to be deposited in the mail at my business address, addressed to the addressee(s) designated below. I am readily familiar with Futterman & Dupree's practice for collection and processing of correspondence and pleadings for mailing. It is deposited with the United States Postal Service on that same day in the ordinary course of business.

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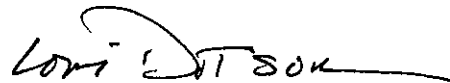
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21
22 I declare that I am employed in the offices of a member of the State Bar of this Court at
23 whose direction the service was made. I declare under penalty of perjury, under the laws of the
united State of America, that the above is true and correct.

24 Executed on September 22, 2008 at San Francisco, California.

25 
26 _____
Lori Dotson